

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Avenue**
5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**
10 **Joe Hand Promotions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **Joe Hand Promotions, Inc.,**

14 **CASE NO. 3:11-cv-06162-JST**

15 **Plaintiff,**

16 **STIPULATION OF DISMISSAL OF**
17 **PLAINTIFF'S COMPLAINT AGAINST**
18 **DEFENDANTS ADAM LOWRY and**
19 **MARGARET LOWRY A/K/A MARGARET**
20 **KLATT, individually and d/b/a TATAMI**
21 **MARTIAL ARTS**

22 **vs.**

23 **Adam Lowry, et al.,**

24 **Defendants.**

25 **IT IS HEREBY STIPULATED** by and between Plaintiff JOE HAND PROMOTIONS, INC.
26 and Defendants ADAM LOWRY and MARGARET LOWRY A/K/A MARGARET KLATT,
27 individually and d/b/a TATAMI MARTIAL ARTS, that the above-entitled action is hereby dismissed
28 **without prejudice** against ADAM LOWRY and MARGARET LOWRY A/K/A MARGARET
KLATT, individually and d/b/a TATAMI MARTIAL ARTS, and subject to the Court's jurisdiction to
enforce the settlement agreement reached between the Parties.

29 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
30 motion to reopen this action by September 10, 2016, the dismissal shall be deemed **with prejudice**.
31 If all terms are satisfied on or before September 10, 2016, than Plaintiff, will file motion to dismiss
32 case with prejudice within 10 days of satisfaction of agreement.

33 **///**

34 **///**

35 **///**

1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party
2 referenced-above shall bear its own attorneys' fees and costs.

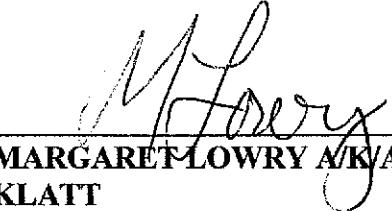
3
4
5 Dated: May 7, 2013

~~LAW OFFICES OF THOMAS P. RILEY, P.C.~~
6 By: Thomas P. Riley, Esquire
7 Attorneys for Plaintiff
8 JOE HAND PROMOTIONS, INC.

9
10 Dated: MAY 8, 2013


11 **ADAM LOWRY**
12 Individually and d/b/a Tatami Martial Arts

13
14 Dated: MAY 8, 2013


15 **MARGARET LOWRY A/K/A MARGARET**
16 **KLATT**
17 Individually and d/b/a Tatami Martial Arts

18
19
20
21
22
23 **IT IS SO ORDERED:**

24
25 Dated: _____

26 The Honorable Jon S. Tigar
27 United States District Court
28 Northern District of California

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On May 7, 2013, I served:

**STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST
DEFENDANTS ADAM LOWRY and MARGARET LOWRY A/K/A MARGARET
KLATT, individually and d/b/a TATAMI MARTIAL ARTS**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Adam Lowry
9951 San Pablo Avenue
El Cerrito, CA 94530

(Defendant, Pro Se)

Ms. Margaret Lowry a/k/a Margaret Klatt
9951 San Pablo Avenue
El Cerrito, CA 94530

(Defendant, Pro Se)

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on May 7, 2013, at South Pasadena, California.

Dated: May 7, 2013

11

**STIPULATION OF DISMISSAL
Case No. 3:11-cv-06162-JST
PAGE 3**